

FILED
U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

JUN - 2 2021

UNITED STATES OF AMERICA

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§

BY
DEPUTY _____

v.

No. 1:21-CR 68

Judge *Heartfield*

RION CARLOS

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 2252A(a)(1)
and (b)(1) & 2 (Transportation of Child
Pornography; Aiding and Abetting)

On or about January 31, 2020, in the Eastern District of Texas, and elsewhere, **Rion Carlos**, defendant, did knowingly transport any child pornography, and did aid and abet Provider 1, an entity known to the Grand Jury, to transport child pornography, as defined in Title 18, United States Code, Section 2256(8), using any means and facility of interstate and foreign commerce, and in or affecting interstate and foreign commerce by any means, including by computer. Specifically, the defendant, **Rion Carlos**, using a communications application, the Internet, and an Apple iPhone cellular phone provided an individual with links to a cloud storage service that caused Provider 1 to transport child pornography to the individual, including the following visual depictions:

FILE IDENTIFIER	DESCRIPTION
o6x6svedqfm9qoi	This video file depicts a underaged female performing oral sex on a male penis
mii7cream	This video file depicts a pre-pubescent female

	naked from her waist down laying on her back legs spread with a male rubbing his penis against her genitalia.
liahee_2544	This video file depicts a pre-pubescent female naked from the waist down straddling a penis and then performing oral sex on a male penis

In violation of 18 U.S.C. §§ 2252A(a)(1) and (b)(1) & 2.

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

Upon conviction of the offense(s) alleged in this Indictment, the defendant, **Rion Carlos**, shall forfeit to the United States his interest in the following property, including, but not limited to:

1. Apple iPhone model N841AP cellular phone, bearing IMEI number 357335091693985

This property is forfeitable pursuant to 18 U.S.C. § 2253(a) based upon the property being:

- (1) any visual depiction described in section . . . 2252 of this chapter, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of this chapter;
- (2) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offense; or
- (3) any property, real or personal, used or intended to be used to commit or to promote the commission of such offense.

By virtue of the commission of the offense alleged in this Indictment, any and all interest the defendant has in this property is vested in and forfeited to the United States pursuant to 18 U.S.C. §§ 2253(a)(1) and (a)(3).

A TRUE BILL

RI 1

GRAND JURY FOREPERSON

NICHOLAS J. GANJEI
ACTING UNITED STATES ATTORNEY

Rachel Grove

RACHEL L. GROVE
Assistant United States Attorney

Date: 6-2-21

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No. 1:21CR 68
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NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. §§ 2252A(a)(1) and (b)(1)

Penalty: Imprisonment for not less than five years and not more than twenty years; but if the defendant has a prior conviction under this chapter, section 1591, chapter 71, chapter 109A, chapter 117, or under section 920 of title 10 (article 120 of the Uniform Code of Military Justice), or under the laws of any State relating to aggravated sexual abuse, sexual abuse, or abusive sexual conduct involving a minor or ward, or the production, possession, receipt, mailing, sale, distribution, shipment, or transportation of child pornography or sex trafficking of children, such person shall be imprisoned for not less than fifteen years and not more than forty years; a fine of not more than \$250,000; and a term of supervised release of not less than five years to life.

Special Assessment: \$ 100.00

JVTA Assessment: \$ 5,000.00